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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

JOSHUA WASHINGTON,

Defendant.

2:16-CR-279-JAD-PAL

**STIPULATION TO RESET
DEADLINES**
(Second Request)

IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre, Acting United States Attorney, and Robert Knief, Assistant United States Attorney, counsel for the United States of America, and Terrence Jackson, counsel for Defendant Joshua Washington, that the deadline for the defendant to additional, supplemental, or modified pleadings regarding defendant's Motion to Suppress Evidence (ECF #54), be reset for September 18, 2017, or a date thereabouts convenient for the Court.

1 This stipulation is entered into for the following reasons:

2 1. New defense counsel has been appointed and the additional time is
3 needed for counsel to become familiar with the facts of the case and evaluate, research,
4 and draft any pleadings related to the previously filed motions.

5 2. Defendant is in custody and does not object to the continuance.

6 3. For the reasons stated above, the ends of justice would best be served by a
7 continuance of the government deadline.

8 4. Additionally, denial of this request for continuance could result in a
9 miscarriage of justice.

10 5. The additional time requested by this Stipulation is excludable in
11 computing the time within which the trial herein must commence pursuant to the
12 Speedy Trial Act, Title 18, United States Code, Sections 3161(h)(3)(A) and (h)(7)(A),
13 considering the factors under Title 18, United States Code, Sections 3161(h)(1)(D),
14 (h)(7)(A), (h)(7)(B)(i), and (h)(7)(B)(iv).

15 6. This is the second request for a continuance filed herein.

16 DATED this 30th day of August, 2017.

17 Respectfully submitted,

18 STEVEN W. MYHRE
19 Acting United States Attorney

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21 /s/ Terrence Jackson
TERRENCE JACKSON
22 Counsel for Defendant

/s/ Robert Knief
ROBERT KNIEF
Assistant United States Attorney

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Defendant.

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1 parties herein sufficient time and the opportunity within which to be able to effectively
2 and thoroughly negotiate the case and prepare for trial, taking into account the
3 exercise of due diligence.

4 The continuance sought herein is excludable under the Speedy Trial Act, Title
5 18, United States Code, Sections 3161(h)(1)(D), (h)(7)(A), (h)(7)(B)(i), and (h)(7)(B)(iv).

6 **ORDER**

7 IT IS THEREFORE ORDERED that the defendant's additional, supplemental,
8 or modified pleadings regarding defendant's Motion to Suppress (ECF #54), are due
9 by the close of business on the 18th day of September, 2017.

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11 DATED this 31st day of August, 2017.

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14 HONORABLE PEGGY A. LEEN
15 UNITED STATES MAGISTRATE JUDGE
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